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12 *Attorneys for Defendants* CELLCO PARTNERSHIP D/B/A
13 VERIZON WIRELESS and VERIZON COMMUNICATIONS, INC

14 **UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 TERESA MACCLELLAND; KAREN
16 UMBERGER; SCOTT WILLITS; MICHAEL
17 BRANOM; MOLLY BROWN; MICHAEL
18 CARNEY; TIM FRASCH; PATRICIA GAGAN;
19 ANNA GUTIERREZ; LINDA JENKINS;
20 AUGUSTUS JOHNSON; WILLIAM KAUPELIS;
21 MARILYN KAYE; JANETTE LISNER;
22 WILLIAM ERIC LOUGH; DAVID MASSARO;
23 LOUISE MONSOUR; DARLEEN PEREZ;
24 GABRIELLE POZZUOLI; VALERIE REED;
25 BRUCE SCHRAMM; KERRY SHOWALTER;
26 JOHN ST. JARRE; GLORIA STERN; EDNA
27 TOY; TERESA TOY; and VANESSA WEST; For
28 Themselves, As Private Attorneys General, and On
Behalf Of All Others Similarly Situated,

Plaintiffs,

v.

26 CELLCO PARTNERSHIP D/B/A VERIZON
27 WIRELESS; and VERIZON
28 COMMUNICATIONS INC.,

Defendants.

CASE NO. 3:21-cv-08592-EMC

**JOINT STIPULATED REQUEST
AND [PROPOSED] ORDER FOR
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES**

The Hon. Edward M. Chen

1 Pursuant to this Court's Order (ECF No. 9) and Local Rules 6-2 and 7-12, the Parties stipulate
2 and declare as follows:

3 WHEREAS, Plaintiffs filed their First Amended Complaint ("FAC") on December 31, 2021
4 (ECF No. 10);

5 WHEREAS, Plaintiffs served their FAC on January 19, 2022 (ECF No. 15);

6 WHEREAS, the Parties have sought one prior extension: by joint stipulation the Parties agreed
7 to a briefing schedule for any motion Verizon filed in response to the FAC (ECF No. 16);

8 WHEREAS, Verizon filed a Motion to Compel Arbitration and Stay Proceedings ("Motion")
9 on March 4, 2022 (ECF No. 20);

10 WHEREAS, a hearing on Verizon's Motion is scheduled for May 12, 2022 at 1:30 p.m. (*Id.*);

11 WHEREAS, a Case Management Conference is currently scheduled for March 22, 2022, at
12 1:30 p.m., and a Case Management Statement is due no later than March 15, 2022 (ECF No. 9);

13 WHEREAS, this Court's order provides that any request to reschedule the Case Management
14 Conference must show good cause and be made by written stipulation within 10 days of the
15 conference (*Id.* at ¶ 2);

16 WHEREAS, in the interest of efficiency and in compliance with the 10-day period specified by
17 the Court's order (ECF No. 9), the Parties agree that Verizon's pending Motion constitutes good cause
18 to continue the Case Management Conference to the same day of the hearing on Verizon's pending
19 Motion;

20 WHEREAS, this request is made in good faith and not for the purposes of delay or any
21 improper purpose;

22 NOW, THEREFORE, THE PARTIES STIPULATE AND REQUEST that: the Case
23 Management Conference be continued to May 12, 2022 at 1:30 p.m., the Case Management Statement
24 be due by May 5, 2022, and that all deadlines associated with the March 22, 2022 Case Management
25 Conference be vacated.

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1 DATED: March 10, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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By */s/ Shon Morgan*

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Shon Morgan

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Attorneys for Defendants VERIZON WIRELESS
and VERIZON COMMUNICATIONS, INC.

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DATED: March 10, 2022

HATTIS & LUKACS

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By */s/ Paul Karl Lukacs*

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Paul Karl Lukacs
Attorneys for Plaintiffs

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SIGNATURE ATTESTATION

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Pursuant to Local Rule 5-1, I hereby attest that concurrence in the filing of this document has
been obtained from each of the other Signatories.

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Dated: March 10, 2022

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/s/ Shon Morgan
Shon Morgan

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1 **[PROPOSED] ORDER**

2 Before the Court is the parties' stipulated request to continue the Case Management
3 Conference and associated deadlines. The Court has considered the stipulation, found good cause, and
4 hereby ORDERS as follows: The Case Management Conference is hereby continued to May 12, 2022
5 at 1:30 p.m., and the Case Management Statement must be filed by no later than May 5, 2022. All
6 deadlines associated with the March 22, 2022 Case Management Conference, are hereby vacated.

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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10 Dated: March 16, 2022



11 Hon. Edward M. Chen
12 United States District Judge

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